

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:

Harlow N. Higinbotham,

Debtor.

Chapter 11

Bankruptcy No. 18-31185

Honorable LaShonda A. Hunt

NOTICE OF MOTION

Please take notice that, on **January 10, 2019, at 11:00 a.m.**, or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable LaShonda A. Hunt, United States Bankruptcy Judge for the Northern District of Illinois, in Courtroom 719 at Everett McKinley Dirksen Federal Building at 219 South Dearborn Street, Chicago, Illinois, to present **Motion of Wipaporn Teekhungam and the Parties' Minor Children for Leave to File a Transcript, Documents, and a Supplemental Brief in Support of Their Motion for Stay Relief**, a copy of which is included herewith and served upon you, at which time and place you may appear.

Dated: January 7, 2019

Wipaporn Teekhungam, A.H., a
minor, **A.H.**, a minor, and **A.H.**, a
minor

By: /s/ Jeffrey K. Paulsen
One of Their Attorneys

William J. Factor (6205675)
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CERTIFICATE OF SERVICE

I, Jeffrey K. Paulsen, an attorney, hereby certify that on January 7, 2019, pursuant to Section II.B.4 of the Administrative Procedures for the Case Management/Electronic Case Filing System and Fed.R.Civ.P. 5(a), I caused a copy of the foregoing *Notice of Motion* and the accompanying *Motion* to be served electronically through the Court's Electronic Notice for Registrants on all persons identified as Registrants on the appended Service List and by U.S. Mail on all other persons identified on the appended Service List.

/s/ Jeffrey K. Paulsen

SERVICE LIST

Registrants

(Service via ECF)

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Non-Registrants

(Service via FedEx Overnight)

Harlow N. Higinbotham

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**MOTION OF WIPAPORN TEEKHUNGAM AND THE
PARTIES' MINOR CHILDREN FOR LEAVE TO FILE A
TRANSCRIPT, DOCUMENTS, AND A SUPPLEMENTAL
BRIEF IN SUPPORT OF THEIR MOTION FOR STAY
RELIEF**

At the last hearing on the motion of Wipaporn Teekhungam and the parties' minor children for relief from the automatic stay, the Court expressed interest in reviewing several documents: the notes and other documents underlying the transactions between the Harlow N. Higinbotham (the "Debtor") and his wife, and the § 341 meeting transcript. Teekhungam and the children have prepared a short supplemental brief, attached as Exhibit 1, providing these documents and explaining how they are relevant to this proceeding, and they now seeks leave to file that brief immediately.

Wherefore, Teekhungam and the children respectfully request that the Court grant them leave to file the supplemental brief attached as Exhibit 1 and grant such further relief as is appropriate in the circumstances.

Dated: January 7, 2019

Wipaporn Teekhungam, A.H., a
minor, **A.H.**, a minor, and **A.H.**, a
minor

By: /s/ Jeffery K. Paulsen
One of Their Attorneys

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